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Pedro Pidwell as Liquidator of
Espirito Santo Financial
Portugal, SGPS, SA*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re: Application of Pedro Pidwell for
An Order Seeking Discovery from
CENTERBRIDGE PARTNERS L.P., and APOLLO
GLOBAL MANAGEMENT, INC. f/k/a APOLLO
GLOBAL MANAGEMENT LLC
Pursuant to 28 U.S.C. § 1782,
In Aid of a Foreign Proceeding
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Case No. _____

***EX PARTE APPLICATION FOR AN ORDER PURSUANT TO 28 U.S.C. § 1782 TO
CONDUCT DISCOVERY FOR USE IN A FOREIGN PROCEEDING***

Petitioner Pedro Pidwell, as liquidator for Espirito Santo Financial Portugal, SGPS, SA, respectfully requests that this Court issue an Order in the form annexed as Exhibit A hereto, granting Petitioner leave pursuant to 28 U.S.C. § 1782 to obtain discovery from Centerbridge Partners L.P. and Apollo Global Management, Inc., by serving them with subpoenas substantially in the form annexed hereto as Exhibits B and C. The discovery sought is for use in a legal proceeding pending in Lisbon, Portugal. The factual and legal basis for Petitioner's discovery application pursuant to 28 U.S.C. § 1782 is set out in the Declaration of Antonio Alfaia de Carvalho and the Memorandum of Law submitted herewith.

Dated: New York, New York
February 1, 2021

Respectfully submitted,

/s/ V. David Rivkin
V. DAVID RIVKIN
GREGORY F. HAUSER

Attorneys for Petitioner